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April 11, 2025

By ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Juszczak v. New York City Department of Education, et al.
1:25-cv-00850-VMS

Dear Judge Scanlon:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to represent the defendants, New York City Department of Education and City of New York ("Defendants"), in the above-referenced action. Defendants write to respectfully request a 60-day extension of time, from April 15, 2025, to June 14, 2025, to respond to the Complaint. This is Defendants' first request for an extension of time to respond to the Complaint, and the requested extension does not affect any scheduled dates. Using the email address *pro se* Plaintiff included in the Complaint, this Office contacted Plaintiff seeking consent to the requested extension, and has received no response from Plaintiff.

The Complaint in this matter contains allegations of Constitutional violations by Defendants, as well as what appear to be claims of retaliation and stigma plus. Additional time is needed to collect and review documents in order to appropriately respond to the Complaint, and to speak with potential witnesses concerning the allegations.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Kathleen M. Linnane

Kathleen M. Linnane
Senior Counsel

cc: Plaintiff *pro se* (by email to helenaj7@gmail.com)
Plaintiff *pro se* (by First Class Mail to Helena Juszczak, 70-36 67th Place, Apt. 1L,
Glendale, NY 11385)